

United States District Court
For The District of Massachusetts

Boston, MA Division

2023 DEC -6 PM 12:03

Case No. 1:06-CR-10004-RGS-1
07-CR-10085-001-DPW

James Bunchan,
Movant,

V.

United States of America,
Respondent.

Supplement To Movant's
Title 18 U.S.C. § 3582(c)(1)(A)
Motion for Compassionate Release,
Under The New November 1, 2023
United States Sentencing Guidelines
§ 1B1.13(b)(6), (6)(d), and (5).

COMES NOW, Movant is a layman of the law, unskilled in the law, and therefore requests that this supplement to the Movant's already submitted Title 18 U.S.C. § 3582 (c)(1)(A) Motion be construed liberally. *Haines V. Kerner*, 404 U.S. 519 (1972).

Movant states the following reasons for this supplement:

1) According to U.S.S. Guideline § 1B1.13 (b)(6), Movant has been incarcerated for over 10 years, Movant is serving an unusually long sentence of 420 months in a Federal Prison, for a fraud conviction. Movant has been incarcerated for this offense since 2007, he is presently in very poor medical health and uses a wheelchair to get around. Also, as he has explained in his original compassionate release Motion, he suffers from various, serious actuarial medical conditions, and is currently at the age of 72, where he requires medical assistance on a constant basis, to the extend that this prison is really not able to provide him with the constant medical assistance he needs, due to the constant lockdowns, murders and assaults as well as drug overdoses constantly transpiring in this prison and throughout the Federal Bureau of Prisons.

2) As the Movant explained in his first compassionate release Motion to this Honorable Court, the Age chart states that the Movant on average only has approximately 8 to 10 years left in which to live, Movant is therefore requesting compassionate release based on these extraordinary and compelling reasons.

U.S.S. Guideline § 1B1.13 (6)(d):Rehabilitational Progress

3) Movant, though in a wheelchair now, continues to strive by any means available to him, to educate himself by reading positive and constructive educational material and taking various programs. Even though he is in a wheelchair, Movant also speaks to the younger inmates and explains to them how important it is to not come back to prison, to take advantage of the programs available and learn from them, so that they will be better and more productive members of society upon their release.

U.S.S. Guideline § 1B1.13(5): Other Reasons

4) The other reasons for relief in regards to the Movant is his very poor health, his age, his constant need for transportation by wheelchair throughout the prison. The danger of the Movant being incarcerated at such an older age and not being able to protect himself from danger in these prisons due to his poor health and medical disabilities, qualify as extraordinary and compelling circumstances and is why the Movant is humbly requesting compassionate release.

5) Movant is also serving an additional 300 months in this case separately, for a non-violent conspiracy to murder, Case No. 07-CR-10085-001-DPW. Movant is serving a total of 55 years. If released, Movant will be living with his son at the following address:

Fredric Bunchan
12330 Bd Rolland Apt. 3
Montreal-Nord, Quebec H1G 3W9, Canada
Tel: (305)922-3024

CERTIFICATE OF SERVICE

I verify under the penalty of perjury, pursuant to 28 U.S.C. § 1746, that a copy of this filing was handed to prison officials for mail, with prepaid first class postage attached, to the following:

Clerk of Court
Monkley US Courthouse
One Courthouse Way
Suite 2300
Boston, MA 02210-3002

11/17/23
 Date

Mail Box Rule
 Lack V. Houston,
 487 U.S. 266(1988)

Signature: JH Bunchian

Printed Name: James Bunchian

Reg. No. 64583-004

Facility Name: FCI Coleman medium

Address: P.O. Box 1032

City, State ZIP: Coleman FL 33521